



May 13, 2024

Via ECF

Hon. Arun Subramanian, U.S.D.J
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Moore v. PPFA, Inc. et al.* (1:22-cv-08899-AS)
Motion to Seal Defendants' Opposition to Plaintiff's Daubert Motion

Dear Judge Subramanian:

We represent Defendants Planned Parenthood Federation of America, Inc. (“PPFA”) and Planned Parenthood Action Fund, Inc. (“PPAF”) (collectively, “Defendants”) in the above-referenced matter. We write pursuant to Individual Rule 11(C)(ii)-(iii) to respectfully request leave to file our Memorandum of Law in Opposition to Plaintiff’s Motion to Preclude Defendants’ Expert (the “Opposition”) under seal, and file a redacted copy on the public docket.

On April 29, 2024, Plaintiff filed her Motion to Preclude Defendants’ Expert. (ECF Nos. 60-63, the “*Daubert Motion*”). Plaintiff simultaneously filed a letter motion seeking leave to file her *Daubert Motion* under seal because it included “highly sensitive medical information including Plaintiff’s physical and psychological treatments and diagnoses.”¹ (ECF No. 59).

The Court granted the request, directing Plaintiff to file redacted copies of the relevant materials on the public docket. (ECF No. 68). Plaintiff did so. (ECF Nos. 69, 70).

Defendants’ Opposition quotes many of the same materials from the *Daubert Motion* that are now filed under seal. Accordingly, we respectfully request that the Court permit Defendants’ to file their Opposition under seal and file a redacted copy on the public docket.

SO ORDERED.

Respectfully,

/s/ Brian Farkas
Brian Farkas, Esq.

Cc (via ECF): All counsel of record.


Arun Subramanian, U.S.D.J.
Date: May 14, 2024

¹ Defendants opposed her sealing request because Plaintiff has put her own medical history squarely at issue in this litigation. (ECF No. 59). However, we wish to remain consistent with the Court’s earlier ruling.